

DECLARATION OF CAROL ALEXANDER

My name is Carol Hall Alexander. I am an adult resident of Westmoreland County, Pennsylvania. I state as follows:

1. I am the mother of Jon Hall.
2. I married Jay Hall when I was fifteen years old. I had just started high school. Jay was nineteen and had attended college on a football scholarship for one year but he flunked out. Neither one of us ever went further in school.
3. At first Jay did not drink much, but then he started working in Pittsburgh and the men he worked with would stop at the bar on the way home so he did too and started drinking everyday. Like his father, Jay ended up drinking alcohol excessively. Also, Jay beat me in drunken rages, just like his father beat his mother.
4. Jon is the youngest child of seven born to me and his father, Jay. Jon has three brothers and three sisters. Kathy the oldest was born in 1950 and Jon the youngest was born in 1964.
5. Jon was born at a hospital in Pittsburgh. His birth was difficult. His due date was September 29th and he was born on August 5. When Jon was born, the umbilical cord was wrapped around his neck a couple times, and he was very jaundiced. I still remember how yellow the whites of eyes were. They told me Jon wasn't going to live. His liver wasn't functioning right. Our bloods were not compatible and were fighting. They kept feeding him sugar water. Even after he went home, I had to keep taking him to the doctor in Pittsburgh so they could check on his liver function.
6. Not long after he was born, he had a very severe case of diarrhea. He became so dehydrated that he was hospitalized for about a week. They could not pinpoint exactly what was causing his problem. They tried banana milk and several other things, and changed his formula several times trying to stop the diarrhea. Finally I had to buy distilled water to use in the preparation of his formula.
7. One time a violent thunderstorm came up while some of the children were at the swimming pool. I went to pick them up, leaving Jon with his dad. When I came home Jon was coughing and Jay said I think he ate a cigarette butt. However that night when Jon wanted his bottle, he'd try to take a drink and it would dribble out of his mouth and he'd cry. He kept crying all night. The next day I took him to the hospital and the x-ray showed that a nickle was caught in Jon's throat. I was told if the nickle had flipped over Jon would not have been able to breath and would have died.

8. Jay said that Jon was not his son. As a result, he ignored Jon while giving attention to his other children, particularly our son Joel. For example, when Jay took the children out for ice cream he would refuse to take Jon along. Jon watched as the rest of the family rode off and he was left at home with me.
9. Jon's brothers and his sister's boyfriends teased Jon unmercifully. They would pull his pants down and also put him up in a tree so he couldn't get down. It would be a game at first then it would get out of hand. At times, they would hit Jon with their fists and other objects.
10. Jay beat Jon with, among other things, his fists, belts and a hunting knife sheath edged in metal. This left a mark the shape of the sheath on Jon's butt.
11. Jay habitually called me a slut and a whore. Jay would grab me and pull my hair. Several times I had black eyes and once a broken finger from him bending my finger backwards.
12. During one especially violent fight, Jay repeatedly slammed my head into the floor, ripped out my hair, and punched me. Jon tried to protect me by hitting Jay with a fly swatter. One time I was going Christmas shopping. As I was leaving, Jay came to the car and said I was not going anywhere. Jay picked up a rock, scraped it across the hood of my car, and then threw it through the car's windshield. This was a large rock about eighteen inches by twelve inches. During another fight, I broke a plate of spaghetti over Jay's head. During others, Jay pointed guns at me. One night I woke up to find Jay, drunk as usual, pointing a gun at my head. If I tried to call someone for help or if the phone rang when he was beating me, Jay would jerk the phone out of wall.
13. Jon and the other children were always present to witness our fights.
14. Jay spent the money he made on gambling and alcohol. I often had to chase Jay down at bars to stop him from drinking away his paycheck. One cold winter night I had to pull him out of a bar because the house didn't have any heat.
15. The plan was for Jay to give me \$60.00 a week to feed our family of nine. Often it was less. In addition, when Jay would run out of money for drinking and gambling, he'd take some of the money he'd given me for the family's food. One time I went to a grocery store and was checking out and was going to get \$20 out of my purse but the money was gone. In its place was a note from Jay saying he had taken the \$20. I had to put the groceries back. At times, the children and I had to look under the couch cushions to find coins that would have fallen out of Jay's pockets when he laid down on the couch to have money to buy milk or bread.

16. I wouldn't let the family eat dinner until Jay came home from work. I wanted my family to be like my birth family with regular meal times. The trouble was that Jay often didn't come home after work, and the children and I would wait into the night to eat. As a result, meals were often overcooked.
17. On report card day there was always a blow up. The girls did well and the boys did not. No matter how well the girls did the boys didn't do well and so their father was always in a rage. This always started at dinner time and left the whole family upset.
18. My mother died five days before Christmas in 1970, my dad died in 1973 and then Jay died in 1974. Jay's grandfather also died in 1974. All I was doing was funeral stuff.
19. Jon was nine years old when he saw his father die. He and Joel watched at their father's bedside as Jay gasped for breath, turned purple, and died. Jon kept saying "Daddy, open your eyes."
20. Jon never talked about his father's death.
21. After Jay died, I had to go to work. I did not finish high school so the only job I could get was as a waitress.
23. I married Ed Alexander three months after Jay died. I was afraid I would loose the house if I did not have someone to help me. Also, I needed help in controlling the boys.
24. Marrying Ed Alexander was a big mistake. The whole thing was on the downward spiral from the get go. Ed abused me and the children. One time I confronted Ed about sexually abusing my daughter, Sheryl. Ed hit me in the stomach and then hit me under the chin knocking me to the floor dazed. Divorce proceedings were underway when Ed Alexander died of a stroke in 1978.
25. After Jon became a teenager he started acting defiantly. For example, when I would ground him and then leave to go to work, he'd get to town before me and I'd see Jon hanging out with his friends in the center of town as I drove by going to work. One time I grounded Jon and I left to go to work. When I returned there were a bunch of kids at the house. Someone had thrown up in the bathroom and there was mud all over the house. There must have been a hundred kids there.
26. When Jon was about 15 he started drinking beer. I was surprised when Jon drank beer because he always said he hated the smell when his dad was drinking.
27. At about the age of fifteen or sixteen, Jon bought a car with the money he had saved from

caddying at the golf club. Jon was doing work on this car and was testing it out when he crashed it into a tree.

28. When Jon still lived with me, he was always disconnecting the phone. If he wanted someone's undivided attention he would disconnect the phone so they could not make or receive calls.
29. Jon was very good about taking care of all of his step-children and children, especially about doing everything for his cerebral palsy child.
30. When Billie was divorcing him, Jon was a basket case. He couldn't be with his kids, his brother Jeff was dying, and he was losing everything. All of this was driving him crazy.
31. Jon had been trying to call me from the jail in Texas. I was attending Billie's funeral in Tennessee. When Jon finally got in touch with me he asked where I had been. I told him we were at a funeral, he asked what funeral. I said "Billie's." He said, "Is she dead?" and started screaming.
32. The only preparation I had for my testimony was a phone call to the motel where I was staying at 11:00 or 11:30 the night before. The attorneys never went over my testimony face-to-face. They just told me to answer the questions and not to mention the fights between Jon and Billie and not to say anything bad about Billie. I was terrified because I had never had to testify in court before.
33. Had I been asked I would have testified about the above matters at Jon's trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


CAROL ALEXANDER
DATE: 8-21-09